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15 Attorneys for Defendants
16 UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION

20 WAYMO LLC,
21 Plaintiff,
22 v.
23 UBER TECHNOLOGIES, INC.,
24 OTTOMOTTO LLC; OTTO TRUCKING LLC,
25 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF THOMAS J.
PARDINI IN SUPPORT OF NON-
PARTY RICHARD JACOBS' MOTION
FOR ADMINISTRATIVE RELIEF TO
FILE CORRESPONDENCE UNDER
SEAL (DKT. 2299)**

1 I, Thomas J. Pardini, declare as follows:

2 1. I am a member of the Bar of the State of California and an attorney at the law firm
3 of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal
4 knowledge and if called as a witness, I could and would competently testify to the matters set
5 forth herein. I make this declaration in support of Non-Party Richard Jacobs' Motion for
6 Administrative Relief to File Correspondence Under Seal (Dkt. 2299).

7 2. I have reviewed the following documents and confirmed that only the portions
8 identified below merit sealing:

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Document	Portions to Be Filed Under Seal
Exhibit A to the Declaration of Martha Boersch	See ¶ 3, below

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13 3. I understand that the Court's November 29, 2017 Order granted sealing with
14 respect to portions of Exhibit A to the Declaration of Martha Boersch. (Dkt. 2307 at 2.) Those
15 portions are marked in green highlighting in Exhibit B to the Court's Order. (Dkt. 2307-2.)
16 Exhibit A to the Boersch Declaration contains information that implicates the safety, privacy, and
17 reputational interests of former and current Uber employees and vendors, as well as various third-
18 party individuals and entities. Defendants support sealing of the green-highlighted portions in
19 Dkt. 2307-2, and may also attempt to obtain additional redactions from the appeals court before
20 the Court's deadline of December 13 at noon. (Dkt. 2307 at 2.)

21 4. Defendants' request to seal is narrowly tailored to the portions of Non-Party
22 Richard Jacobs' Motion and supporting exhibits that merit sealing.

23 I declare under penalty of perjury that the foregoing is true and correct. Executed this 4th
24 day of December, 2017 at San Francisco, California.

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/s/ Thomas J. Pardini
Thomas J. Pardini